

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:25-cv-391-CCE-LPA**

JOSHUA STOW, SHARONE BUNN,
AND TIARA LOFTON, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

ACTIVEHOURS, INC. d/b/a EARNIN,

Defendant.

**CONSENT MOTION TO EXTEND BRIEFING SCHEDULE RE:
DEFENDANT’S MOTION TO COMPEL ARBITRATION**

1. Pursuant to Federal Rule of Civil Procedure 6(b), Plaintiffs respectfully move the Court to extend the time for the parties to complete briefing on Defendant’s Motion to Compel Arbitration (the “Motion”), filed on July 17, 2025. (ECF 16.)

2. The parties have conferred and agree that good cause exists for an extended briefing schedule for the Motion, which will allow sufficient time for Plaintiffs to fully investigate the factual evidence presented in the Motion, which appended three declarations, as well as electronic records, and for Defendant to respond accordingly. In addition, as Plaintiffs consented to Defendant’s requested extension to respond to the Complaint, (June 16, 2025 Text Order), good cause further exists to provide Plaintiffs with a proportional amount of time to respond to the Motion.

3. Plaintiffs thus respectfully request that the Court establish the following briefing schedule for the Motion:

Event	Current Deadline	Modified Deadline
Plaintiffs' Response Brief	Aug. 7, 2025	Sept. 8, 2025
Defendant's Reply Brief	Aug. 21, 2025	Oct. 8, 2025

4. Undersigned counsel conferred with counsel for Defendant, who consents to the relief requested in this motion. A proposed order is being submitted with this motion.

Respectfully submitted,

Dated: July 28, 2025

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** Admitted by Special Appearance*